



September 9, 2020

Via Case Management/Electronic Case Files (CM/ECF) System

The Honorable Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East, Chambers N 626
Brooklyn New York 11201

Re: *Abruzzo Docg Inc., et. al. v. Acceptance Indemnity Ins. Co., et. al.*
Case No: 1:20-cv-04160-MKB-JO
Our File No.: 114360

Dear Judge Brodie:

We represent Defendant Acceptance Indemnity Insurance Company (“Acceptance”) in the above-captioned matter. We write to request an extension of time allowing Acceptance until October 2, 2020, to file its answer or present other defenses or objections. The original deadline is Friday, September 11, 2020. There have been no previous requests for adjournment or enlargement of time. We have emailed and called Plaintiffs’ counsel concerning whether they consent to this request. As of the filing of this letter, we have received no response. As such, Acceptance respectfully requests the Court grant the instant application, and order that Acceptance file its answer or present other defenses or objections on or before October 2, 2020.

Please do not hesitate to contact the undersigned if you have any questions or require further information. The Court’s time and attention to this matter are greatly appreciated.

Very truly yours,

Foran Glennon Palandech Ponzi & Rudloff PC

/s/ Charles J. Rocco
Charles J. Rocco, Esq. (CR8646)
Ashley C. Vicere, Esq. (AV0612)
Attorneys for Defendant Acceptance Indemnity Insurance Company
40 Wall Street, 54th Floor
New York, New York 10005
(212) 257-7100
crocco@fgppr.com
avicere@fgppr.com

FORAN GLENNON PALANDECH PONZI & RUDLOFF PC

Charles J. Rocco, Attorney at Law 212.257.7101 crocco@fgppr.com
40 Wall Street, 54th Floor, New York, New York 10005 tel 212.257.7100 www.fgppr.com

Chicago | Irvine | San Francisco | New York | London | Denver | Las Vegas | Phoenix

To: The Honorable Margo K. Brodie

Date: September 9, 2020

Page 2 of 2

Cc: ***Via Case Management/Electronic Case Files (CM/ECF) System***

Jeremy M. Creelan
Michael W. Ross
Seth H. Agata
Jenna E. Ross
Jacob D. Alderdice
JENNER & BLOCK LLP
Attorneys for Plaintiffs
919 Third Ave., 38th Floor
New York, NY 10022
Telephone: 212-891-1678
Email: jereelan@jenner.com

John H. Mathias Jr.
David M. Kroeger
Brian S. Scarbrough
Jan A. Larson
Gabriel K. Gillett
Caroline L. Meneau
JENNER & BLOCK LLP
Attorneys for Plaintiffs
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: 312-923-2917
Email: jmathias@jenner.com